

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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**DEBRA SPERO, as Natural Mother of  
V.S., an infant,**

Plaintiffs,

v.

**VESTAL CENTRAL SCHOOL DISTRICT  
BOARD OF EDUCATION, VESTAL CENTRAL  
SCHOOL DISTRICT, JEFFREY AHEARN,  
Superintendent of Schools, ALBERT A. PENNA,  
Interim Principal of Vestal High School,  
DEBORAH CADDICK and CLIFFORD KASSON,  
in their Individual and Official Capacities,**

Defendants,

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**AFFIDAVIT OF CLIFFORD  
KASSON**

Civil Action No.: 3:17-cv-00007  
(GTS/DEP)

STATE OF NEW YORK     )  
                                      ) ss.:  
COUNTY OF BROOME     )

CLIFFORD KASSON, being duly sworn, deposes and says:

1. I am an assistant superintendent of schools for Defendant Vestal Central School District (hereinafter "District"). At the times pertinent to this affidavit, I was an assistant principal at the District's high school. I make this affidavit of my own personal knowledge and am fully competent to testify as to all matters herein.

2. Plaintiff Vincent Spero transferred from the Binghamton City School District to the Vestal Central School District at or around the beginning of his freshman year in the 2013-2014 school year.

3. In 2016, administrators at the District, including me, became aware of a videorecording that showed Plaintiff confronting a younger and smaller student, G.S., at a gas

station. The videorecording appears as file “Spero-student verbal confrontation” on Motion Exhibit 17.

4. I interviewed five students, including B.H., on or about December 2, 2016, concerning allegations of a racist seating chart made by Plaintiff. None of the students, including B.H., reported any racial slur as having been made by the classroom teacher, Katharine Dyer.

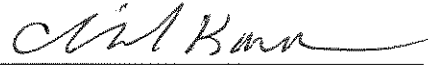
5. Later, on December 9 and 12, 2016, Deborah Caddick and I interviewed the remaining students in the class. None of them reported any racial slur by Ms. Dyer.

6. In fact, to this day, the only student other than Plaintiff who has ever claimed to have heard Ms. Dyer use a racial slur was B.H., who did not mention it on December 2, 2016, and did not make this claim until a month later, when a superintendent’s hearing concerning Plaintiff was already under way.

7. Some students confirmed that some of the students of color in the class had been seated toward the back of the room. However, none actually stated they believed the seating arrangement was racially motivated. Those who did speak to Ms. Dyer’s motivation at all indicated they did not believe she had any racial motivation, except for B.H., whose comment was limited to saying that when Plaintiff accused Ms. Dyer of racism, it was “not unfair of him.”

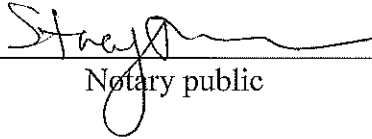
8. On December 8, 2016, there was substantial disruption in the District resulting from Plaintiff’s posting of a “Snapchat story” involving a gun, after a series of postings on Twitter expressing what appeared to be significant anger against the District. The flood of calls and reports was so constant that the administrators and our staff did not even have time to record what calls and reports came in. We had all they could handle just responding to tell each individual that the issue had come to our attention and we were addressing it.

9. The fallout from Plaintiff's posts, including handling calls, reports, and inquiries from students, staff, and parents; various meetings regarding the issue; and other related matters, occupied me, Ms. Caddick, Dr. Albert Penna, and Superintendent of Schools Ahearn, from when the issue was first reported to the end of the day.



**Clifford Kasson**

Sworn to before me this 28<sup>th</sup>  
day of May, 2019.

  
Notary public

Stacy J. Wickham  
Notary Public, State of NY  
01WI6109564

Residing in Tioga County  
My Commission Expires May 10, 2020